HARROW COUNCIL

Corporate Anti-Fraud Team Year End Report 2019/20

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Introduction

This report outlines the corporate ant-fraud work carried out for the year 2019-20. The plan is risk based and developed through consultation internally and drawing upon external sources of data to ensure that where possible best practice is followed (see CIPFA Fraud Code Self-Assessment below) and fraud resources are targeted at those areas of the authority deemed to be of highest risk to fraud with the greatest potential negative financial impact and/or reputational damage. The plan is approved by the Governance, Audit, Risk Management & Standards Committee (GARMS) annually and mid-year and year end progress reports provided against the plan to provide a level of assurance around the authorities' fraud risk resilience capability.

Summary of Outcomes

A summary of key outputs from the programme of corporate anti-fraud work for the year is recorded in the table below. Of the 17 work streams contained within the plan, 12 (70%) were achieved, 2 (12%) were partially achieved and 3 (18%) were not achieved. 4 out of the 5 key performance indicators were achieved (80%) whilst 1 (20%) was not achieved.

	Fraud work stream	2019-20 Year end outcome
1	Corporate fraud risk assessment Identify and assess Harrow's fraud risk exposure affecting the principle activities in order to fully understand changing patterns in fraud and corruption threats and the potential harmful consequences to the authority and our customers	Objective achieved This task is undertaken annually which feeds into the development of the annual plan for the following year. The adjusted annual plan for 2020-21 will be presented to the Committee in October 2020.
2.	CIPFA Fraud Code Self-Assessment Undertake an annual self-assessment against the CIPFA Code of Managing the Risk of Fraud & Corruption	Objective achieved 78% compliance with the code has been achieved which is a good level of compliance with the code which remains unchanged from 2018/19. Consideration will be given to drafting an action plan for Committee to consider on whether to implement if the authority is to continue to improve above 78% compliance
3	Corporate fraud risk register Review and facilitate the updating of the fraud risk register annually where significant fraud and corruption risks are identified, mitigated and monitored	Objective not achieved This was not achieved due to a lack of capacity, but this is mitigated somewhat with the corporate fraud risk assessment work completed annually that feeds into the development of the annual plan.
4	Corporate Anti-Fraud & Corruption Strategy Review the Corporate Anti-Fraud & Corruption Strategy 2016-19 that links to Harrow's corporate priorities, the overall goal of improving resilience to fraud and corruption and fully reflecting the fraud and corruption risks faced by the authority. Timing of the review will depend on the completed review/refresh of the Fighting Fraud & Corruption Locally Strategy that is being undertaken in 2019/20 by the FFCL Board	Objective not achieved due to timing of FFCL strategy release The Counter Fraud and Corruption Strategy for Local Government was published in April 2020 by the Fighting Fraud & Corruption Locally (FFCL) Board, but due to Covid-19 the official launch was delayed to October 2020. A review of Harrow's Corporate Anti-Fraud & Corruption Strategy will be undertaken in 2020-21 so that it aligns to the new strategy.

	Fraud work stream	2019-20 Year end outcome		
5.	Establish a fraud loss methodology Develop and implement a fraud loss value methodology to apply consistently to significant fraud risk exposures enabling fraud losses to be measured accurately	Objective not achieved This was not achieved due to a lack of capacity on the team. The team uses best practice and established methodologies for most areas of fraud investigated, but not all. Consideration will be given to completing this task 2019-20		
6.	National Fraud Initiative co-ordination role Co-ordination of the 2018/19 National Fraud Initiative (NFI) data match processing including: Supporting service areas to ensure matches are processed in a timely manner and that suspected fraud is referred for investigation Processing matches which are the responsibility of the CAFT (Housing matches) Investigate potential fraud cases referred and recommend sanction and/or corrective action on cases as appropriate	Services have processed all high risk matches February 2019. A brief summary of progress is Housing Benefit Total matches 2639 Total processed 127 In progress 0 Value of fraud & error identified £122,216.06 Creditors standing Total matches 435 Total progressed 28 In progress 0 Value of fraud & error identified £0 Housing Tenants (CAFT matches) Total matches 169 Total progressed 168 In progress 0 Value of fraud & error identified £0 Procurement Total matches 124 Total processed 50 In progress 0 Value of fraud & error identified £0		

Payroll

Right to Buy Total matches 199 Total matches 3 Total processed 3 Total processed 183 In progress 0 In progress 0

Value of fraud & error identified £0 Value of fraud & error identified £0

Private residential care homes

Residents parking permits Total matches 8 Total matches 47 Total processed 45 Processed 1 In progressed 0 In progress 0

Value of fraud & error identified £0 Value of fraud & error identified £12,086.70

Blue badge parking permit Waiting list

Total matches 316 Total matches 507 Total processed 303 Total processed 391 In progress 116 In progress 0

Value of fraud & error identified £706,320¹ Value of fraud & error identified £80,500²

There have been 11 NFI fraud referrals to the CAFT since April 2019, 7 have been closed no further action, 2 were closed as positive outcomes (CTRS cases) and 2 cases are still under investigation.

Overall cumulative fraud savings attributed to this work stream is £940,842.93

¹ Notional cost of removing 1 case from the waiting list following a match is £3240 as per Cabinet Office guidance

² Notional cost of recovering a blue badge out of circulation registered to a deceased individual is £575 as per Cabinet Office guidance

	Fraud work stream	2019-20 Year end outcome
7.	London Counter Fraud Hub (LCFH)	Objective achieved
	Explore the membership of the London Counter Fraud Hub (LCFH) which may result in the authority participating in a pan London data matching exercise focusing on Council Tax Single Person Discount, Business rates and Housing Tenancy fraud.	LCFH has now been rebranded the CIPFA Counter Fraud Hub and there have been some minor changes to the membership conditions. Nevertheless, it is unlikely that the authority will commit to joining whilst the projected return on investment does not make financial sense.
8.	Participate in a Cifas 6 month pilot	Objective achieved
	membership Join a 6 month pilot membership of Cifas which is the UK's leading fraud prevention service that facilitates the sharing of fraud data for the prevention and detection of crime across the public, private and third sectors.	Cifas is a not for profit organisation run for members to securely exchange information about known frauds affecting their business to enable other members to protect themselves from fraud and corruption. Membership of Cifas allows organisations to both file frauds that reach an evidence threshold and to search the database at any time during a customer relationship to see if they are known to other members as fraudsters. The authority was one of a few pilot sites launched in April 2019 and whilst accessing Cifas data has undoubtedly added value to the CAFT investigations in terms of intelligence gathering, there have been some challenges around sharing data and ensuring that data subjects are made aware that the authority is working with Cifas.
		The CAFT is at present using the Cifas database to sift all cases that are referred for investigation (reactive) but the intention is to use the database more proactively and a) batch match sets of data on a risk basis to target areas of high fraud risk and b) to expand the access to Cifas to other services in the authority. Discussions were well advanced with both Insurance and Procurement services at the end of the year, but this has since stalled due to the Covid-19 emergency. The expansion of the Cifas system internally will be continued in the 2020-21 plan.
		Given the long lead in time and nature of fraud investigation work, a decision was made by the pilot authorities and Cifas that the initial pilot period would be extended to March 2021 to allow a greater opportunity of casework throughput and for positive outcomes to be identified.

9. Corporate anti-fraud awareness

Raise awareness of fraud and corruption risks both within the authority and in the community through the publication of fraud successes in local and national media, including the use of all forms of social media including the following actions:-

Embed fraud E-learning to existing employees

- Chief Executive Newsletters and general internal communications bulletins in relation to articles on fraud and corruption
- Issuing management reports detailing investigation outcomes and recommendations for improving fraud risk controls are implemented if agreed according to risk (KPI5)
- Deliver fraud workshops/CAFT attendance at team meetings for high fraud risk areas as appropriate
- Publicity through all forms of media on successful fraud cases, fraud initiatives and related prosecution outcomes

Objective partially achieved

E-learning

The fraud e-learning package has been heavily promoted through internal communications and the course content has recently been updated to reflect current fraud risks facing Local Authorities.

Chief Executive Newsletters

There have been no Chief Executive Newsletters, internal communications or bulletins in relation to fraud articles up to the mid-year point.

Management reports and briefing notes

In total, 27 fraud risk recommendations contained within investigation reports and briefing notes have been made to management with 26 being agreed for implementation. **KPI5 target 70%, achieved 96% (26/27).**

Fraud Workshops

CAFT have not delivered any fraud workshops this year.

Publicity

Harrow Council featured in a Cifas article about <u>Single Person Discount fraud</u> in September 2019

10. Fraud liaison

Explore, develop and maintain effective liaison with investigation teams in other boroughs and external agencies and ensure that membership and interest

Objective achieved

The authority renewed its membership of the National Anti Fraud Network (NAFN) for its essential role in intelligence gathering and the London Borough of Fraud Investigators Group (LBFIG). NAFN is an essential conduit for accessing 3rd party information sources which is vital for supporting investigation work.

continues in the London Borough of Fraud Investigators Group (LBFIG), The National Anti-Fraud Network (NAFN), The Chartered Institute of Public Finance and Accountancy (CIPFA) and the proposed London Counter Fraud Hub

Officers in the team have also attended a number of Counter Fraud Conferences during the year which is important to keep up to date of current fraud trends and emerging fraud risks.

Established partnerships with the Border Force, HMRC, the Home Office, the Metropolitan Police and other enforcement agencies have proven essential to current investigation work.

The authority joined Cifas in April 2019. See section 8.

	Fraud work stream	2019-20 Year end outcome	
11.	Internal datamatching	Objective achieved	
	Design and deliver an anti-fraud campaign using the iDIS data matching tool for the purposes of detecting, preventing and pursuing fraud and corruption	A housing tenancy fraud datamatch against credit bureau data was undertaken in Q3 where all current housing tenants were matched against credit bureau data to identify a) those tenants that were credit active at addresses other than the tenancy, b) those tenants that had no active credit footprint at the tenancy, and c) those where individuals other than the tenant were credit active at tenancy indicating a sublet. A total of 73 investigations were launched involving the case types mentioned above but no	
		tenancy fraud has been identified to date with only 1 case still live under investigation	
12.	Housing fraud	Objective partially achieved	
	Assess and investigate allegations of fraud and abuse in the housing system working in partnership with Housing Resident Services, Housing Needs and Harrow's RSL's including:	Tenancy recoveries work stream Working in partnership with Housing Resident Services and Harrow's Registered Social Landlords (RSLs), 6 social housing tenancies were recovered resulting in notional fraud savings of £558,000.	
	Seek to recover 10 social housing	KPI1 target 10, achieved 6 (60%)	
	units subject to fraud & misuse (KPI1)	Savings subtotal achieved £558,000	
	Prevent housing application fraud through a proactive fraud risk based targeted review of those customers in emergency accommodation (placed outside of the borough)	Housing applications work stream Housing Applications proactive exercise was commenced in Q4 (desk based intelligence) but the visiting schedule was not possible to due to Covid-19. Consideration will be made in the 2020-21 plan to complete this work.	
	Prevent fraudulent Right to Buy (RTB) applications through targeted application validation with a fraud	A total of 13 housing application referrals have been received by the team during the year and 2 positive outcomes have been achieved where applications were rejected on the basis that the applicant had provided false or misleading information.	
	check on 90% applications referred to the CAFT at offer stage (KPI2)	Savings sub total achieved £99,000	
	Maximise the use of powers contained within the Prevention of Social Housing Fraud Act 2013	RTB work stream Working in partnerships with Leasehold Services, HB Public Law Services and Housing Management, 6 RTB applications were intercepted saving the authority £658,000 in terms of purchase discount losses prevented.	

(PoSHFA) in terms of gathering evidence, investigation and prosecution of offenders and recovery of unlawful profit

These outcomes are due to applicants failing anti-money laundering checks (proving the source of funds) or following CAFT consultation with the lenders, the mortgage offer being withdrawn. The team is continuing to make use of the National Hunter system allowing the authority to communicate with lenders lawfully for the prevention and detection of crime and referring cases where appropriate to the National Crime Agency (NCA).

KPI2 target 90%, achieved 100%

Savings subtotal achieved £658,000

PoSHFA 2013 Powers work stream

The authority has utilised powers contained within the above act through requests to the National Anti Fraud Network (NAFN) regularly during the year.

If approved by NAFN, this enables the authority to access personal financial data held by the banks on individuals on cases of suspected tenancy sub-let, RTB and housing applications where there is doubt over the accuracy of the subject's account of events

Overall fraud savings attributed to this work stream is £1,315.000

	Fraud work stream	2019-20 Year end outcome	
13	Internal fraud & corruption	Objective achieved	
	Risk assess 80% allegations of internal fraud and corruption as a priority and deploy resources on those cases where there is corroborative evidence within an	Of the 8 internal fraud referrals received all 8 were risk assessed and resources allocated in 5 working days.	
		KPI3 target 80%, achieved 100%.	
	average of 5 workings days of receipt of the information (KPI3).	There have been 2 positive outcomes during the year.	
		An employee was arrested in April 2018 and dismissed in June 2018 following misuse of a company purchase card resulting in salary savings of £19,890. This was reported previously to the Committee. On 16 th July 2019, they were convicted at Willesden Magistrates Court of fraud amounting to £494.42 and sentenced to 200 hours of unpaid work to be complete within 12 months and a compensation order to repay the full loss amount to the authority.	
		In the second case, a former employee already dismissed and successfully prosecuted for fraud was the subject of a successful Proceeds of Crime Act (POCA) order where the court made an order that the value of the authority pension was to be paid across to the authority to pay towards the debt. The pension value was £75,102.10	
		Overall fraud savings attributed to this work stream is £75,596.52 plus £80 costs	
14	Revenues/Business Rates/Council Tax Support fraud	Objective achieved	
	Work in partnership with Revenues and Benefits to investigate allegations of fraud and abuse on a risk basis of the Council Tax, Council Tax Support and Non	The team processed 9 referrals of Council Tax discount/exemption fraud, CTRS fraud and NNDR fraud. There have been 14 positive outcomes during the year primarily identified from linked investigations into tenancy fraud where the tenant was in receipt of a benefit/exemption/reduction but no longer occupied the address as their principle home.	
	Domestic Rates Systems, including exemptions, discounts and reliefs, apply appropriate sanctions where fraud is	CTRS/CTB overpayments £21,871.67 HB overpayments £126,782.97	
	proven and assist in the recovery of fraud related losses	Overall fraud savings attributed to this work stream is £148,654.64	
15	Social care fraud	Objective achieved	
	Work in partnership with the People Directorate to investigate allegation of fraud and abuse of the social care system	There have been 6 positive outcomes involving social care cases; 2 involving residential care, 3 involving personal budget cases and 1 case involving a No Recourse to Public Funds (NRPF) case.	

	including but not limited to:-	
	 Personal budget applications, assessment and monitoring of spend 	A personal budget investigation uncovered false documentation that an individual had submitted to continue to receive care for their son, but the reality was that the care was not taking place. The investigation is now complete and a reassessment of the applicant has resulted in the individual being invoiced for in excess of £100,000. A decision on further punitive action is pending.
	 A proactive fraud risk based exercise in relation to those individuals being financially supported in long term residential care 	In case two, the personal budget was being misused by an individual and funds spent on items outside of the agreed care plan. There is an overpayment in excess of £17,000 on this case. The final case involved an individual that failed to disclose capital for the purposes of the financial assessment which would have meant that they would not have received any financial support had it been declared. This overpayment amounts to in excess of £26,000.
		The proactive fraud risk based exercise in relation to residential care financial assessments commenced in Q4 of 2018/19 continued in 2019/20 and of the 20 cases reviewed, 2 are currently live under investigation with suspicions that the applicant / representative have failed to disclose capital/assets impacting the financial assessment.
		The other long term residential care case is a historical investigation where a family member deliberately deprived the applicant of capital which would have impacted the financial assessment. The overpayment of care fees in this case is in excess of £100,000. The authority obtained a charging order in January 2020 and next steps were to apply for an order of sale in order to recover the losses.
		The one 'no recourse to public funds' (NRPF) case was investigated where the applicant had failed to disclose to the authority that their immigration status had changed so continued to receive financial support from the authority whilst claiming state benefits too. This amounted to a loss of £2626 which is being recovered.
		Overall fraud savings attributed to this work stream is £274,953.76
16	Partnership working	Objective achieved
	Responding to requests for information in a timely manner from our law enforcement partners e.g Police, HMRC, Other LA's etc	The team handled many requests for information from other law enforcement agencies to support their work and have maintained a positive working relationship with the Department for Work & Pensions, the Metropolitan Police and other forces in the UK, the UK Border Agency, Registered Social Landlords and other Local Authorities.
17	Risk assess allegations of fraud and	Objective achieved

corruption

Risk assess 80% of allegations of fraud and corruption and deploy resources on those cases deemed sufficiently high enough fraud risk within an average of 10 working days of receipt of the information. (KPI4) Of the 205 referrals received during the year, 201 (98%) were risk assessed and resources deployed to those cases accepted for investigation within 10 working days.

KPI4 target 80%, achieved 98%

Performance of Corporate Anti-Fraud Team

Introduction

A number of Key Performance Indicators (KPIs) were agreed as part of the 2019/20 Corporate Anti-Fraud Plan and performance against these is set out in the table below:

No.	CAFT Key Performance Indicators 2019/20	Target	Mid- year	Year- end	Comments
1.	Recovery of 10 social housing units subject to fraud and misuse	100%	40% (4/10)	60% (6/10)	Not achieved 6 social housing units were recovered during the year. The proactive exercise run in Q3 provided disappointing results which was a contributing factor to this outcome.
2.	Fraud validation checks undertaken on Right to Buy applications referred to the CAFT at offer stage and before completion	90%	100% (14/14)	100% (27/27)	Achieved 27 Right to Buy applications received by the team during in the year, all had anti money laundering checks carried out before purchase or were in progress before a decision made to accept or deny the purchase.
3.	Internal fraud and corruption referrals risk assessed and resources deployed in 5 working days	80%	100% (6/6)	100% (8/8)	Achieved Of the 8 internal fraud and corruption referrals received by the team, all 6 (100%) were risk assessed and resources deployed within 5 working days
4.	Fraud and corruption referrals risk assessed and resources deployed in 10 working days	80%	96% (66/69)	98% (201/ 205)	Achieved Of the 205 referrals received by the team during the year, 201 (98%) were risk assessed and resources deployed within 10 working days.
5.	Fraud risk recommendations agreed for implementation	70%	94% (15/16)	96% (26/27)	Achieved Of the 27 fraud risk recommendations made by the team in reports and briefing notes, 26 (98%) were agreed for implementation by management

Fraud referrals, outcomes and savings summary

Fraud Risk Area	19/20 Q1 & 2	19/20 Q3 & 4
Housing application fraud		
Referrals	11	2
Positive outcomes	0	2
Savings	0	£99,000 (2 x applications rejected)
Blue badge		
Referrals	10	6
Positive outcomes	1 (successful prosecution)	0
Savings	£980 (£500 notional outcome, £250 court costs, £200 fine and £30 victim surcharge)	0
Fraud other		
Referrals	3	1
Positive outcomes	0	0
Savings	0	0
No Recourse to Public Funds		
Referrals	2	1
Positive outcomes	1	0
Savings	£2626	0
Revenues/CT/CTRS/HB		
Referrals	4	5
Positive outcomes	10	4
Savings	£90,290.55 (mainly linked housing fraud investigations)	£58,364.05 (mainly linked housing fraud investigations)
Internal		
Referrals	7	2
Positive outcomes	1 (successful prosecution of former employee for	1
Savings	purchase card misuse)	

	£579.42	£75,102.1 (Proceeds of crime act award against former employee)	
Right to Buy			
Referrals	14	20	
Positive outcomes	4	2	
Savings	£439,500 (4 x RTB applications rejected)	£218,500 (2 x RTB applications rejected)	
Social care/grants			
Referrals	6	2	
Positive outcomes	4	1	
Savings			
Tenancy			
Referrals	18	99	
Positive outcomes	4	2	
Savings	£372,000 (4 x tenancies recovered)	£186,000 (2 x tenancies recovered)	
NFI			
Positive outcomes	379	22	
Savings	£894,857.34 (see section 6 for detail. Mid year 19/20 running total)	£45,985.59	
Totals			
Referrals	75	138	
Positive outcomes	404 (inc NFI cases)	34 (inc new NFI cases)	
Fraud Savings	£2,049,159.43	£709,579.38	

2019-20 Year End Financial Summary

The level of fraud and corruption identified impacting the authority for 2019-20 amounts to in excess of £2.7 million which represents an approximate return on investment for the team's running costs of just over 10:1